

JANE HARMAN
36TH DISTRICT, CALIFORNIA

ORIGINAL



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TELECOMMUNICATIONS AND THE INTERNET
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House of Representatives

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December 3, 2002

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DEC - 3 2002

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Petition of the California Public Utilities Commission for Authority to Implement Technology-Specific Overlays; Petition of the California Public Utilities Commission for Waiver of the Federal Communications Commission's Contamination Threshold Rule, CC Docket No. 99-200

Dear Ms. Dortch:

On November 25 concerned small business owners, residents, senior citizens, and advocates for the disabled and AIDS patients participated in a Town Meeting on the proposals to avoid a geographic split to area code 310 put forth by the California Public Utilities Commission and referenced above. This meeting, attended by an overflow crowd put a human face on the problem of area code exhaust.

A videotape of the meeting, as well as materials submitted at the event, are attached. In addition, I am continuing to receive correspondence from constituents opposing an area code split and supporting the CPUC. I am also forwarding a sampling of these, to be included in the record of this proceeding. I will continue to forward such correspondence, as it is received.

The November 25 Town Meeting had bipartisan support from public officials, including El Segundo Mayor Mike Gordon and Torrance Mayor Dan Walker and Los Angeles County Supervisor Don Knabe. California Public Utilities Commission President Loretta Lynch and Federal Communications Commissioner Michael J. Copps both traveled to my district to participate in this meeting.

Community leaders explained why an area code split would be detrimental. These leaders included: Mark Waronek, chairman of the South Bay Association of Chambers of Commerce, speaking on behalf of small businesses; John Parsons, Councilman, Redondo Beach and Vice Chair, South Bay Cities Council of Governments, speaking on

behalf of local governments; Hope Witkowsky, Councilwoman, City of Torrance, speaking on behalf of senior citizens; Alma Martinez of Friends Without Barriers, speaking on behalf of AIDS patients; and Arun Bhumitra, CEO of Arjay Telecom, speaking on behalf of small, wireless carriers. These speakers, as well as audience participants, overwhelmingly supported the CPUC's petitions.

The region I represent has endured an inordinate number of area code changes in the past decade. The California Public Utilities Commission proposals would prevent area code exhaustion and as the attached documentation shows, would minimize disruption to consumers, small businesses, senior citizens and the sick and disabled. I urge the Commission to adopt these proposals as soon as possible.

Sincerely,



JANE HARMAN
Member of Congress

CC. Honorable Michael K. Powell
Honorable Kathleen Q. Abernathy
Honorable Michael J. Copps
Honorable Kevin J. Martin
Thomas Sugrue
William Maher
Diane Griffin

Attachments as stated



U.S. Rep. Jane Harman CA 36th Congressional District

P R E S S R E L E A S E

229 Cannon Building, Washington, DC 20515

<http://www.house.gov/harman>

For Immediate Release

November 25, 2002

Contact: Corey Brown

(202) 226-7286

AREA CODE 310 NEARS EXHAUSTION - HARMAN HOLDS TOWN MEETING TO PERSUADE FCC TO AVOID AREA CODE SPLIT *Town meeting puts human face on pitfalls of area code split*

El Segundo - Congresswoman Jane Harman (D-Redondo Beach) held a town meeting today to help put a human face on the mathematical problem of area code exhaustion. As area code 310 continues to run out of numbers, the Federal Communications Commission (FCC) will soon have to decide if some residents of the South Bay **will** be given a different 3 number area code and if every resident of the South Bay **will** have to dial ten digits.

Commissioner Michael Copps, one of the five FCC Commissioners who will decide the fate of the 310 area code and of ten-digit dialing, flew in from Washington, DC at the request of Congresswoman Harman to hear from senior citizens, residents and small business owners about the potential impact of an area code split.

"I am grateful to Commissioner Copps for coming to see first-hand how upset this community is about this issue. This town meeting is an opportunity for the FCC, the California PUC, and our community to sit down at the same table and hammer out a strategy," said Harman, who has been fighting the area code split since her return to Congress in January 2001. "Now we must work together to conserve 310 phone numbers so that seniors and small businesses will not be hurt."

Approximately 75 South Bay residents attended the meeting. Marge Miyamura, a local senior citizen, expressed her concern about the elderly having to learn a new area code. Many other senior citizens who suffer from memory loss echoed this worry. Alma Martinez, President of Friends Without Barriers, an organization that helps people living with HIV-AIDS, explained that patients with AIDS often develop dementia, making it extremely difficult to learn new phone numbers.

Steve Diels, a small business owner from Redondo Beach voiced his concern stating: "My business relies on hundreds of phone numbers and would be faced with thousands of dollars in labor costs, not to mention costs for essentials like business cards, signs, stationery and advertising. We have already gone from 213 to 310 to ten-digit dialing and back to seven. We don't need an area code split."

-more-

During the meeting, California Public Utilities Commission President Loretta Lynch and Congresswoman Harman outlined actions the FCC should take:

- Provide a new code for items, such as hand held e-mail devices, computers and ATM machines, where the phone number is not even known to the user. This is called a technology overlay. Such a change will cause less disruption for most consumers, small businesses and senior citizens.
- Change the rules concerning how a block of numbers needs to be shared with other telecommunications companies. Now if a company uses less than 10 percent of a block it must share the block with other companies. A new rule would require companies to share a block if less than 25 percent of the numbers are used, freeing up more phone numbers in the 310 area code.
- Adopt a technology overlay without going to ten-digit dialing. This will save consumers, especially seniors and the disabled, the burden of having to dial ten digits every time they call. And it will save small businesses time and money in reprogramming their phones. Currently, California law requires users throughout the state to dial only seven digits.
- Handle California's requests within the FCC, rather than referring them to an outside advisory committee, which would slow down the process.

Last year, legislation authored by State Senator Debra Bowen was enacted requiring the California Public Utilities Commission to use technology overlays unless it determines such an overlay would be more inconvenient to telephone users than a traditional geographic area code split.

The California PUC has filed two petitions for FCC review. The public comment period will last until December 10, 2002.

Harman will forward written and oral comments from today's meeting. Additional comments can be sent via the internet: <http://www.fcc.gov/e-file/ecfs.html> and should reference CC Docket No. 99-200. Written comments sent to Congresswoman Harman's Office, 811 N. Catalina Ave, Suite 1302, Redondo Beach, California 90277 before December 10 will be forwarded to the FCC.

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million dollars, following upon an equally expensive area code change that occurred in 1991.'

The burdens are not limited to the private sector. City Governments would bear a similar expense to upgrade and reprogram telephones and computer servers, to change letterhead, business cards, and all printed material used by the municipality such as posters, brochures and flyers.¹⁰ The South Bay Cities Council of Governments estimates that the six larger cities in the region will incur costs of from \$55,000-\$75,000 each, and that the smaller nine cities would incur a cost of \$15,000 each.

Another alternative to the specialized overlay the CPUC proposes, an all-services overlay, would be too confusing and unwieldy. It could mean, for example, that a residence would have one area code for its voice service, a different area code for its fax, and a different area code for each individual family member. This would be extremely confusing for the elderly, consumers, and customers of small businesses.

4. Conclusion

For the foregoing reasons, **South Bay Association of Chambers of Commerce** urge the Commission to grant the small business community relief from still another expensive, time-consuming and

⁹ Letter from Daniel J. McClain, TRW, to Hon. Jane Harman (Aug. 31, 2001), attachment 5

¹⁰ Letter from City of Torrance Mayor Dee Hardison to Hon. Jane Harman (Sept. 4, 2001), attachment 3.

burdensome area code change in Los Angeles and to grant the CPUC's petition for technology specific overlay area codes.

Respectfully submitted,

Mark A. Waronek
Chairman of the Board,
South Bay Association of Chambers of Commerce

Date: November 25, 2002

As CPUC President Lynch testified before the House Committee on Energy and Commerce, Subcommittee on Telecommunications and the Internet, “wireless growth continues in large part to drive the need for new area codes.”⁴ According to CPUC estimates, the wireless industry experienced a 48% increase from 1999-2000 in the State of California as compared to a national growth rate of 27%. Wireless retail revenues increased by 33% in the period from 1998-2000, to a total of \$6.5 billion in California, and with a 36% growth in 2000 alone.⁵ The phenomenal growth of the wireless industry is a prime reason that area codes are facing exhaustion in Los Angeles. Given this remarkable growth pattern, the most prudent alternative for all carriers and all consumers, residential and business, large and small, is to create an overlay which can absorb such service demand increases with minimal disruption to current number-holders.⁶

The overlays proposed in the CPUC petition minimize the burdens of introducing a new area code for the entire community. Wireless customers in the new overlay could reach a larger area with just seven-digit dialing, as the overlay’s boundaries are larger than those of the existing geographic codes.

³ Supra note 1. See also, E-Mail from Palos Verde Peninsula Chamber of Commerce to Hon. Jane Harman (Sept. 4, 2001) (complaining of prior area code changes in locality), attachment 1.

⁴ Prepared Testimony of CPUC President Loretta Lynch, before the House Committee on Energy and Commerce, Subcommittee on Telecommunications and the Internet, June 26, 2002, at 2.

⁵ *The Status of Telecommunications Competition in California* (submitted by the CPUC to the California State Legislature June 5, 2002), Chapter 4.

⁶ See, e.g., letter from John E. Flood, City of Palos Verde Estates, to Hon. Jane Harman (Sept. 4, 2001), (supporting technology-specific overlay), attachment 2.

3. Any Solution Other than What the CPUC Proposes Would Inflict Unfair Burdens on Businesses, Their Customers and Other Residents

One alternative to the CPUC's proposal would be yet another geographic code split. After the California energy crisis, and given the difficult economic conditions small businesses now face, inflicting these burdens on them now is unreasonable and unwarranted. One local group has estimated that to make an area code change, "larger" firms (500-plus employees) would incur costs of \$25,000-\$75,000, medium size firms (100-499 employees), costs of \$15,000 to \$25,000, and small firms (less than 100 employees), costs of \$10,000 to \$25,000.⁷

Businesses have to notify all their contacts and clients of their changed contact information and reprint all stationery, brochures, flyers: signs, promotional material and business cards. Small businesses that have paid for yellow page ads to attract new clients will fail to see results from this expenditure. In the case of a start-up enterprise with narrow profit margins, these and other burdens could pose a fatal setback.'

It is important to recognize that the 310 area code is also home to many Fortune 500 corporations, who will incur proportionately increased expenses because of their size. TRW, for example, has estimated that an area code change would cost a half'

⁷ Letter from City of Torrance Mayor Dee Hardison to Hon. Jane Harman (Sept. 4, 2001), attachment 3

⁸ Email from Marilyn Crouch of Avenues to Organizations. to Redondo Beach Chamber of Commerce (August 27, 2001), attachment 4.

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the matter of:

Numbering Resource Optimization

CC Docket 99-200

Petition of the California Public Utilities
Commission for Authority to Implement
Technology-Specific Overlay Area Codes

Comments of the South Bay Association of Chambers of Commerce

As new telecommunications growth has skyrocketed, Southern Californians have endured an inordinate number of area code splits and telephone number changes.¹ When landline numbers change, businesses, particularly small businesses, spend considerable time and money to change stationery, signage and customer and vendor databases. They lose confused or time-pressured customers to competitors who are lucky enough to be able to keep their phone numbers. Given the difficult economy, and the recent energy crisis in the State of California, local businesses can ill afford additional financial pressures.

For these and other reasons discussed below, the South Bay Association of Chambers of Commerce support of the Petition of the California Public Utilities Commission for Authority to Implement Technology-Specific Overlay Area Codes (CPUC Petition).

¹ There have been at least five area code changes in the last ten years in the region (909 in 1992, 626 in 1997, 949 in 1998, 562 in 1998, 323 in 1998, and 858 in 1999).

1. The Petition

The California Public Utilities Commission (CPUC) has petitioned the Commission to allow area code overlays for existing codes 310 and 909, which are projected *to* run out of numbers. The proposed overlay would apply to (1) all “non-geographic” numbers or “hidden” numbers for services like ATMs, On-Star and E-fax, as well as numbers assigned to modems or fax machines used by businesses with greater than 50 lines and (2) all wireless numbers (except paging numbers). The CPUC proposal would also move all existing wireless numbers (except for paging numbers) to the new overlay. These wireless customers would undergo an area code change only—they would not change their current seven-digit number. After two years, the overlays would encompass new numbers needed for all services. Customers dialing within any area code overlay or existing code would not have to dial ten digits.

2. The Overlay Proposed by the CPUC Is the Best Choice for the Community

California as a whole has endured an inordinate amount of area code change.² Nowhere is this more the case than in the Los Angeles region, which has had at least five area code changes in the last ten years.³

² Cf. California Public Utilities Code Section 7934 (a) (“The number of area codes in this state has more than doubled since 1991”).

REMARKS OF HOPE WITKOWSKY

NOVEMBER 25, 2002

I am the Executive Director of a Senior Volunteer Program that serves the South Bay Community. I also wear the hat of Councilwoman in the City of Torrance.

I have been working with and for seniors in this field for over 10 years and feel that my testimony is representative of their views on this subject. I have also had discussions with them on the possibility of having an area code change.

Overwhelmingly they have stated their views to me on the hardship it would cause them and others that are older than them.

Seniors who are trying to live independently and stay in their home in their old age save the taxpayer money. Those who need to be institutionalized cost the taxpayer money since they are using money from the Social Security system. For seniors to live their long life at home they need few changes to their routine. One of their life saving tools is the telephone. It is their link to help in an emergency. To change even one number on their frequently called phone list can upset their whole world.

Don't take that lifeline away from them by changing the 310 area code. I suggest that you look at providing alternatives for those seniors.

Please look to those higher functioning individuals who use cell phones, fax machines and pagers as the candidates for a change in area codes.

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Testimony for November 25 Town Meeting

Arun Bhumitra, CEO
Arjay Communications

Good afternoon! Thank you for this opportunity to speak on behalf of the wireless industry and small business. This issue will affect every person in the 4th district encompassing over 2 million people.

I would like to add that this area also has the best political leaders, who are humming from delivery of the C-17 100th unit to the Air Force one day to keeping the hospitals open to saving the sick and elderly, and stimulating growth and make this area a great place to live! It is not surprising that this high-tech issue of new area code implementation, our leaders know more than some of the experts in the field.

I think the plan put together by PUC is excellent. I would add:

1. In New **York**, there was a special area code for cellular (917) for an interim period—and it seemed to work well.
2. In countries like Singapore, etc. there is a number such as **6** to identify cellular and a number 7 for landline.

In any event, I remember in mid 1988 when the 213 area code was split and my organization had to physically change the phone number chip in every transceiver of cellular phones- a very expensive proposition. Today all phones are digital and have over the air activation. I salute the PUC and the staff for this great resolution, and no physical activity is required. The switch is loaded with new program and the process is seamless.

The new proposal would have a routing table on switch to put new NPA (Number Plan Agrees or area codes) the NXX & XXXX remains the same. So cellular phones would not have to change area codes.

I salute the PUC and the staff for this great resolution, and no physical activity is required. The switch is loaded with new program and the process is seamless.

Again, thank you !!!!!

November 25, 2002

Reauest for Congresswoman Jane Harmon's Intervention

On behalf of the Board of Directors of Friends Without Barriers/Amigos Sin Barreras (Amigos), and the population it serves, I would like to entreat Congresswoman Jane Harmon to do everything in her power to prevent the split of our (310) area code, and also prevent the increase of digits required to make a call. Over 5,000 HIV and AIDS patients living in the South Bay will be affected by this change. I speak on behalf of Amigos.

Amigos is a non-profit organization serving persons living with HIV and AIDS in the South Bay. We currently serve 50 clients, and will increase that amount to over 150 as of January 1, 2003, when we take over AIDS Heartline, a food pantry program. Here is how the proposed changes will affect our clients:

Clients frequently call their case managers, program directors, doctors, therapists, hospitals, pharmacies, and other specialists. I personally receive from 15 to 20 calls from my clients in one week. If in crisis, a client will call me several times in one day.

We know that deaths resulting from AIDS have decreased dramatically due to new drugs in the market. **That** is the good news. The bad news is that these same drugs are toxic, and affect every organ in the body. We therefore have clients who are visually impaired, have gastrointestinal problems, severe kidney, lung, heart, and liver disease, and advanced neuropathy. More debilitating, is the memory loss and confusion due to dementia. With these issues, there is always the probability of dialing wrong numbers, delaying calls, and worse, avoidance in making a call. Aside from the possibility of a tragedy occurring, the results will definitely create more anxiety than is already part of their everyday lives, and will diminish their quality of life.

If I may, I would like to add a personal note. I am a senior citizen with physical challenges. I make myriad of calls on a daily basis. Having to use another area code, or to dial ten digits with every call, would be extremely difficult for me. If I cannot connect with my clients, my clients will again be adversely affected by this proposed change.

Today, I am their voice; please listen.

*U.S. Congresswoman Jane Harman
November 25, 2002*

*Presentation by
Loretta M. Lynch*



Utilities Commission

- From 1947 to January 1997, the number of area codes in California increased gradually from 3 to 13.
- During the next three years, the number of area codes in California nearly doubled. By 1999, California had 25 area codes statewide, and the industry projected CA would need 17 more area codes by the end of 2002.
- Beginning in 1999, the California Public Utilities Commission (CPUC) implemented several measures that revolutionized the state's numbering policies. Thanks to these efforts, California's area codes still stand at 25.



California's Aggressive and Successful Conservation Efforts Have Saved Area Codes

- *Actual Number Use vs. Forecast:* the CPUC rejected using carriers' forecasts of new demand as a basis to determine the need for new area codes, relying on facts, not the carriers' marketing projections.
- Relying on actual need for new numbers, not carriers' forecasts of demand, the CPUC stopped unnecessary area code proliferation.
- In March 2000, the CPUC initiated the first-ever utilization study of actual number use in California, in the 310 area code. The CPUC found 3.3 million unused telephone numbers left in 310 -- an area code that was supposedly entirely out of available telephone numbers.
- By the end of 2001, the CPUC counted available numbers in each of CA's other 24 area codes. In every case, we found that between 40-80% of the available numbers in each area code were unused. ***con't.***



California's Aggressive and Successful Conservation Efforts Have Saved Our Area Codes (con't)

- *Distributing telephone numbers more efficiently:* the CPUC now distributes new telephone numbers to carriers more efficiently, through a number “pool”.
 - Number pooling allows telephone companies to receive numbers in 1,000 number blocks, rather than in 10,000 number blocks.
 - In March 2000, with special FCC authorization, California began the first number “pool” in the 310 area code.
 - Today, the CPUC has implemented pooling in 24 of California's 25 area codes, in order to boost the efficiency of phone number allocation. The remaining area code, 661, will begin pooling in March 2003. By allowing CA to distribute numbers in smaller blocks, we can better match the numbering needs of new telephone companies without stranding the remaining numbers in the prefix.
- con 't.*



California's Aggressive and Successful Conservation Efforts Have Saved Our Area Codes (con't)

9 The CPUC Has Acted Aggressively to Conserve Numbers:

- Requires companies to return any prefix the carrier has held for more than six months without using it;
- Requires companies to show they will be out of numbers within six months before granting requests for additional numbers to prevent hoarding;
- Requires companies to show they have used at least 75% of the numbers they hold before they can request additional numbers.
- Companies must assign numbers in sequence, moving to the next block only after using 75% of their current numbers to prevent number cherry-picking.

con 't.



California's Aggressive and Successful Conservation Efforts Have Saved Our Area Codes (con't)

- CA's number conservation actions have resulted in more numbers available for number pooling or for other use by phone companies. Since the CPUC extended the 75% use requirement in all California area codes, the demand for growth prefixes in each month's lottery has declined.
- In 1999, based on industry self-reported forecasts of future demand, 17 of California's 25 area codes would have been split by the end of 2002. Comparing 1999 forecast exhaust with more recent projections shows that CA has prolonged the lives of these area codes by several quarters – and some by several years!



Area Code Changes Impose Real Costs on Consumers

- Businesses must notify customers of any telephone number changes, including a change of area code. Businesses can and do lose customers simply because customers are not aware the business is in a new area code
- Businesses must change all forms of advertising, including signage on the premises and on vehicles, as well as media advertisements, trade publication listings and stationery
- Residential customers must inform employers, family members, friends and associates, as well as schools, medical offices, and other business and government contacts, of any change in telephone number, including an area code change

con 't.



Area Code Changes Impose Real Costs on Consumers (con't)

- Government agencies and educational institutions must notify all whom they serve of any change to telephone numbers, including area code changes
- As numbers are increasingly automatically programmed, area code changes require more expensive and time-consuming reprogramming of many machines
- Each of these steps incurs a cost to a CA business or family, in terms of time, effort and money spent to inform customers, suppliers, friends and business relationships about the change. Time spent on notification, reprogramming and new materials is lost time that could be devoted to other productive activities.



Further Actions Necessary to Prolong Area Code Life

- The FCC must grant California's request to implement a Specialized Overlay for the 310 and 909 area codes
- 9 The FCC must grant California's request to increase the Contamination Threshold from 10% to 25%
- 9 The FCC must hold wireless carriers accountable for joining the nation's number pools (effective yesterday)
- The FCC must require wireless carriers to implement Local Number Portability technology by the new deadline of November 24, 2003



909 technology-specific or specialized overlay (SO)

- Implemented over the 909/714/949 area codes
- 172 cellular/PCS codes in the 909 area code will take an area code change. Wireline and paging codes remain in 909
- On a prospective basis, codes used for paging, cellular/pcs, and “transparent” or “non-geographic numbers” in the 909/714/949 areas will be assigned to the SO area code.
- SO requirements will last for two years. After two years, the SO will convert to an all-services overlay.
- 909 is projected to exhaust in 2nd Qtr 2003
- With implementation of the SO, the life of the 909 area code will be extended, at minimum, for five years



310 technology-specific or specialized overlay (SO)

- Implemented over the 310/213/323/562 area codes
- 149 cellular/PCS codes in the 310 area code will take an area code change. Wireline and paging codes remain in the 310 area code
- On a prospective basis, codes used for paging, cellular/pcs, and “transparent” or “non-geographic numbers” in the 310/213/323/562 areas will be assigned to the SO area code.
- SO requirements will last for two years. After two years, the SO will convert to an all-services overlay
- 310 is projected to exhaust in 2nd Qtr 2003

con't.



310 technology-specific or specialized overlay (SO) (con't)

- With implementation of the SO, the life of the 310 area code will be extended, at minimum, for five years.
- The life of the 323 area code will be extended by 19 years. The life of the 213 area code will be extended by 6 years. The life of the 562 area code will be extended by 27 years.
- Life of the SO code will, at a minimum, last for a period of four years.
- The SO area code and the underlying area codes will keep seven-digit dialing within area codes.

con't.



California's Petition to Raise Pooling Contamination Level to 25%

- Maximizes the amount of available numbers in areas where number pooling has been implemented and promotes more efficient number allocation and usage.
- Will make available up to 6.1 million more numbers in **CA** in blocks which are more than 10% used (or contaminated) but less than 25% used.
- By increasing the contamination threshold to 25%, California will avoid wasting stranded numbers in each area code and will ensure greater control over the quantity of number the block holder retains.
- Will help delay the exhaust and expansion of the North American Numbering Plan.

con 't.



California's Petition to Raise Pooling Contamination Level to 25% (con't)

- In the 310 area code, 215,015 available numbers exist in the number blocks which are greater than 10% used (or contaminated) but less than 25% used.
- In the 900 area code, 236,903 available numbers exist in the number blocks which are greater than 10% used (or contaminated) but less than 25% used.
- Four area codes (323, 510, 562, and 760) have over 300,000 available numbers in number blocks which are greater than 10% used (or contaminated) but less than 25% used.

